



## DISABILITY AND COMMUNICATION ACCESS BOARD

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### INTERPRETIVE OPINION

Pursuant to §103-50, Hawaii Revised Statutes (HRS), all buildings and facilities constructed by, or on behalf of the State or any county, shall conform to the Americans with Disabilities Act Accessibility Guidelines (ADAAG) and amendments. In accordance to HRS §103-50 and Chapter 11-217, Hawaii Administrative Rules, the Disability and Communication Access Board has authority to issue interpretive opinions to HRS §103-50 design standards.

**Docket:** **DCAB 2001-16:** Interpretive Opinion on Residential Housing Accessibility Guidelines (RHAG) 13.3.6(10) Kitchen Storage. Can a floor to ceiling pantry cabinet serve as equivalent facilitation in lieu of lowering upper wall cabinets?

**Summary:** The RHAG 13.3.6(10) requires cabinets, drawers, and shelf areas to comply with 4.25 (ADAAG Storage), and for at least one shelf of all cabinets and storage shelves mounted above work counters, the maximum height above finished floors shall be 48 inches. When the Architectural Access Committee (AAC) referenced the Uniform Federal Accessibility Standards (UFAS) in the creation of the RHAG, the appendix was not included. The appendix allows that full height cabinets can be provided rather than cabinets mounted over work counters, and that the provision of additional storage space located conveniently adjacent to kitchens can make up for space lost when cabinets under counters are removed. The Access Board would consider this as *equivalent facilitation*, but acknowledges that the appropriate authority must make the decision.

**Ruling:** For buildings or facilities subject to HRS § 103-50,

#### **RHAG 13.3.6(10)(a) Kitchen Storage**

The maximum height shall be 48 inches (1220 mm) for at least one shelf of all cabinets and storage shelves mounted above work counters. Full height cabinets or tall cabinets located within the envelope of the kitchen area may be allowed rather than cabinets mounted over work counters as equivalent facilitation where space is limited or when full compliance would constrict other kitchen usages, such as small appliance operations.

[Rul: 11/01] (Auth and Imp: HRS §103-50)

If you have any questions or comments regarding this ruling, please call us at 586-8121.

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